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Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) 2:19-cr-00071-RFB-BNW
) (First Request)
)
STYLES'ZA WASHINGTON,)
)
Defendant.)
)

**STIPULATION AND ORDER FOR EXTENSION OF TIME TO
FILE OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT
AND CONTINUE SENTENCING**

Certification: This Stipulation and Order is being timely filed

IT IS HEREBY STIPULATED by and between Christopher Chiou, Acting United States Attorney and, SHAHEEN TORGLEY, Assistant United States Attorney, Counsel for the United States of America and, LANCE A. MANINGO, of Maningo Law, counsel for Defendant STYLES'ZA WASHINGTON, that the deadline for Defendant's objections to the Presentence Investigation Report presently due May 12, 2021 be extended thirty (30) days, and the sentencing currently set on June 8, 2021 be vacated and continued thirty (30) days or to a date and time convenient to this Honorable Court.

This Stipulation is entered into for the following reasons:

1. That counsel received the Presentence Investigation Report on April 28, 2021;

2. That WASHINGTON's objections to the Presentence Investigation Report are due on May 12, 2021;
3. That WASHINGTON contacted undersigned counsel on May 11, 2021, to discuss objections to the PSR;
4. That counsel needs additional time to prepare objections to the Presentence Investigation Report as well as prepare for sentencing;
5. That the AUSA Shaheen Torgoley is agreeable to the continuance;
6. That WASHINGTON, who is out of custody, has no objection to the continuance;
7. That denial of this request for continuance would deny the Defendant, STYLES'ZA WASHINGTON, sufficient time within which to effectively make objections to his Presentence Investigation Report, if any, and thoroughly prepare for sentencing, taking into account the exercise of due diligence; and
8. That denial of this request for a continuance could result in a miscarriage of justice.

RESPECTFULLY SUBMITTED this 11th day of May, 2021.

CHRISTOPHER CHIOU
United States Attorney
By: /s/ Shaheen Torgoley
SHAHEEN TORGOLEY
Assistant United States Attorney
Counsel for Plaintiff

MANINGO LAW
By: /s/ Lance Maningo
LANCE MANINGO, ESQ.
Counsel for Defendant WASHINGTON

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)
STYLES'ZA WASHINGTON,)
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Defendant.)
_____)

FINDINGS OF FACT

Based upon the pending Stipulation of the parties, and good cause therefore, the Court finds that:

1. That counsel received the Presentence Investigation Report on April 28, 2021;
2. That WASHINGTON's objections to the Presentence Investigation Report are due on May 12, 2021;
3. That WASHINGTON contacted undersigned counsel on May 11, 2021, to discuss objections to the PSR;
4. That counsel needs additional time to prepare objections to the Presentence Investigation Report as well as prepare for sentencing;
5. That the AUSA Shaheen Torgoley is agreeable to the continuance;
6. That WASHINGTON, who is out of custody, has no objection to the continuance;
7. That denial of this request for continuance would deny the Defendant, STYLES'ZA WASHINGTON, sufficient time within which to effectively

make objections to his Presentence Investigation Report, if any, and thoroughly prepare for sentencing, taking into account the exercise of due diligence; and

8. That denial of this request for a continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interests of the public and the defendant, since the failure to grant said continuance would be likely to result in a miscarriage of justice.

ORDER

IT IS THEREFORE ORDERED that the deadline to file objections to the Presentence Investigation Report, previously set for May 12, 2021 is elapsed and continued to June 14, 2021;

IT IS FURTHER ORDERED that the that sentencing in this matter currently scheduled for June 8, 2021 at 11:00 a.m. be vacated and continued to July 8, 2021 at 1:00 PM in LV Courtroom 7C.

DATED this 14th day of May, 2021.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

/s/ Lance Maningo
LANCE A. MANINGO, ESQ.
Nevada Bar No.: 006405
400 S. 4th Street, Suite 650
Las Vegas, Nevada 89101
Attorney for Defendant